



Carolyn  
Callihan/R4/USEPA/US  
12/21/2006 10:57 AM

To "Kemp, Mark" <Mark.Kemp@atlantahousing.org>  
cc "Jacoppo, David" <David.Jacoppo@atlantahousing.org>,  
jsasine@pogolaw.com  
bcc Carolyn Callihan/R4/USEPA/US  
Subject: RE: 141 Fort Street- Grady Homes - Atlanta

Mark,

Thanks for all of the information. It's clear that the highest lead results taken during these past studies were from windowsills (lead paint) and not the soils. I've reviewed your probable location for the former Miller Metals building and I think the more probable location is the parking lot or just south of the parking lot which corresponds with the oval which says "MJK, Law Engineering 1995, Composite Sampling of soil areas around the perimeter of parking lot - 345 ppm." I am comparing two Sanborn maps dated 1931 and 1950. On the 1931 map, the 141 Fort Street building is located to the south of the intersection of Gilmer and Fort Streets. In the 1950 map, you can see the truncated Gilmer Street on the left of the map and the truncated Fort Street at the very top of the map. If you connect those lines to find the intersection within the Grady Homes buildings, and then draw the line just south of there, you would have the approximate location of the former Miller Metals building. Then transpose that to the map you have provided below. It looks like the Miller Metals building would now be in that parking lot area. Of course, there are differences in the way the buildings are laid out in the 1950 map and the map you provided, which could lend some uncertainty to my theory.

With all of that said, I wanted to let you know that based on all of the information gathered from historic sources and the Atlanta Housing Authority, EPA will not enter this site into the CERCLIS database for any further evaluation. The only evidence that there was any type of smelting operation here is from the historic City directories. Unfortunately, we do not have any Sanborn maps from the time that the company would have operated here, so it's difficult to know if the small building at 141 Fort Street was expanded or not. The fact that there was a junkyard in the area of the building would make it more logical for some sort of rudimentary smelting operations to be taking place there. However, it would be impossible to differentiate any contamination arising from junkyard operations from any smelting operations that may have taken place. Other factors (which would limit the ability to attribute any contamination to a possible smelting operation) include the disturbances to the junkyard/smelting era soils from the construction and demolition of the Grady Homes structures and the lead paint which was used in the Grady Homes project.

For any future construction and development activities, you may want to consider looking at the soils once again at surface and possibly shallow subsurface to see if there was any impact to the soils from the former junkyard, particularly since the junkyard appears to have covered such a wide area (1931 map). It would be wise to run a full metals scan, at the very least.

Again, thank you for your cooperation in this matter and for all of the information that you have provided. Please let me know if you have any questions.

Sincerely,  
Carolyn Callihan  
Superfund Remedial Project Manager  
Superfund Site Evaluation Section  
Waste Management Division  
EPA Region 4  
404-562-8913

"Kemp, Mark" <Mark.Kemp@atlantahousing.org>



"Kemp, Mark"  
<Mark.Kemp@atlantahousing.org>

To Carolyn Callihan/R4/USEPA/US@EPA  
cc "Jacoppo, David" <David.Jacoppo@atlantahousing.org>,



10531446



11/17/2006 12:14 PM

jsasine@pogolaw.com  
Subject RE: 141 Fort Street- Grady Homes - Atlanta

Carolyn,

As you requested, I have prepared a PDF with the mapped locations of samples in the area of concern. In order to clarify the location of some the descriptions of the samples and landmarks, I conferred with the previous property manager of Grady Homes.

This map also includes the probable location of the building in question as compared to the Grady Homes site plan. After some extensive scale work, I believe this is a very close approximation of location and size. Clearly, this building was not much more than a 10'x18' structure, if that.

Nevertheless, in various locations in the surrounding areas of the building and generally within the mapping concentration area are oval rings which depict locations where samples were taken either by LAW Engineering in 1995 or ATC in 1999. Drag the cursor over the ovals to obtain more detailed information. If you have any trouble with this file, please let me know and I can print and scan a color version to you.

As it relates to questions/observations from your previous email, I've attempted to answer them to the best of my knowledge below:

Samples 22 and 241 on Attachment A of the 2/14/2000 Supplemental HSRA letter are indeed noted to be on playgrounds. But they are playgrounds that are not generally near the 141 Fort Street address. Thus they are not included on the attached map I prepared.

Since the purpose of AHA's sampling to date has been to comply with HUD standards related to Lead Based Paint in Targeted Properties, and to some extent satisfy the State EPD HSRA requirements, the samples indicated on the map were only tested for lead. So other metals would not be detected. I can find no evidence that XRF testing was used as part of the soil sampling.

Based upon my review of the documents and previous discussions with ATC staff that conducted the sampling, it is apparent that all of the soil samples were taken only at surficial depths (i.e., spooning bare spots). The methodology varies from both composite and discrete sampling, which I have tried to relay in the mapping descriptions. From what I can tell, and through experience with ATC, there was no real magic number of grabs for the composite sampling - just enough to insure a snapshot of the area and to meet the laboratory amount needed.

As you requested, I have also included the main body of ATC's 1999 report that includes all dust, paint and soil sampling data. Also, I have included pages from the 1995 LAW report that are applicable to the mapping of soil samples.

Please let me know if I missed anything. Otherwise, I look forward to your reply and next steps, if any.

Thanks.

Mark

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Mark Kemp  
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The Housing Authority of the City of Atlanta, Georgia

230 John Wesley Dobbs Avenue  
Atlanta, Georgia 30303-2421

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From: Kemp, Mark  
Sent: Fri 11/10/2006 8:26 AM  
To: Callihan.Carolyn@epamail.epa.gov  
Cc: Jacoppo, David; jsasine@pogolaw.com  
Subject: RE: 141 Fort Street- Grady Homes - Atlanta

I'll get to work on the answers to your questions and put together a map with the sample locations, as well as gather the reports you are requesting. I expect to be able to complete this and get it to you on or before 11/17.

Please let me know if you need it sooner.

Thanks.

Mark

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From: Callihan.Carolyn@epamail.epa.gov [mailto:Callihan.Carolyn@epamail.epa.gov]  
Sent: Thu 11/9/2006 2:47 PM  
To: Kemp, Mark  
Cc: Jacoppo, David; jsasine@pogolaw.com  
Subject: Re: 141 Fort Street- Grady Homes - Atlanta

Mr. Kemp,  
I apologize for taking so long to get back to you. Do you have a map showing where the ATC 1/26/2000 samples were taken? From what I see, it would be difficult to distinguish any metals contamination that might have come from Miller Metals (if indeed the smelter did operate at the Fort Street address) from what may have been contributed by the junkyard operation, let alone the possible contribution by lead-based paint,

which may have been used at Grady Homes. With the construction and demolition of Grady Homes since this metals operation was located there, it would be very difficult to isolate any possible contamination from the metal smelter.

With that being said, it would be much easier to make conclusions if I had a map showing where these samples were taken instead of just a description. As best as I can tell, 141 Fort Street would be where the "play area" of Grady Homes was located. In Attachment A of the 2/14/2000 letter, Samples 22 and 241 appear to be the only samples addressing the playground area.

Other questions that come to mind:

Were the samples tested for any metals or constituents other than lead? Were these samples sent to a laboratory or was XRF analysis performed in the field?

What were the depths of the samples and how were they taken?

What were the criteria for compositing the samples (how many grabs went into a composite and over what size area per composite?) A copy of ATC's actual report would be helpful.

Thanks so much,

Carolyn Callihan  
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"Kemp, Mark"  
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To  
Carolyn Callihan/R4/USEPA/US@EPA  
10/26/2006 03:23 cc  
PM jsasine@pogolaw.com, "Jacoppo, David"  
<David.Jacoppo@atlantahousing.org>  
>  
Subject  
141 Fort Street- Grady Homes -  
Atlanta

Carolyn,

I have attached the relevant documents we have been able to locate related to your inquiry into the potential historical smelting business located within the Grady Homes footprint. These documents include maps, aerial photographs and correspondence with the State EPD, which also contains summaries of sample data for lead in soil. I have also reviewed some geotechnical reports for another part of the property currently under development.

In summary, what I have found may not be as helpful as we would have liked. Nevertheless, the documents reveal that of the surface sampling that was completed for lead in soil around the suspect area, none indicate levels higher than those that are generally found elsewhere throughout the property. Most of those samples are included in the Supplemental HSRA notification to the EPD. The only ones anywhere close to the suspect area that were not included in the HSRA data were taken at 148 Bell Street in 1995 by LAW Engineering. The highest of these four samples was 179 ppm for lead. The remaining 38 samples from 1995 were taken across other parts of the property, mainly around the day care center, playgrounds and related areas.

As to the question of fill and topography, the geotechnical report for another area of Grady Homes undergoing redevelopment indicates fill ranging from 2-8 feet. So it is possible that fill was used or that the topography was reshaped at some point prior to the development of Grady Homes. An early topo map is included in the maps provided. But I'm not sure how helpful it will be.

At this point, we will await further instructions from you as to how you would like to proceed. We are ready to assist in any way we can.

Please let me know if you have any questions.

Thanks.

Mark

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Mark Kemp.  
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(See attached file: Grady Maps & Aerials.pdf)(See attached file: Grady Original Site Plan.pdf)(See attached file: Grady HSRA Lead 10-21-1997.pdf)(See attached file: Grady HSRA Supplement 2-14-2000.pdf)  
(See attached file: Grady EPD No Listing Ltr.pdf)

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Grady Original Site Plan with Sample Locations.pdf Pages from Grady Homes - FINAL LBP RISK ASSESS RPT 111299.pdf



Pages from Bookmarked Grady Homes LBP Report LAW 8-18-95 142 Bell Street Play Area.pdf



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